

NRG Texas Power LLC  
1201 Fannin St.  
Houston, TX 77002

**CERTIFIED MAIL -- RETURN RECEIPT REQUESTED**

April 1, 2015

Ms. Carolyn Maus  
Air Permits Division, MC-163  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, Texas 78711-3087

RECEIVED  
15 APR - 3 PM 3:15  
AIR PERMITS SECTION  
6PD-R

**Subject: Title V Draft Review Response for Site Operating Permit No. 0-00074  
W. A. Parish Electric Generating Station  
TCEQ Account ID Number: FG-0020-V  
Customer Reference Number: CN603207218  
Regulated Entity Reference Number: RN100888312  
TCEQ Project Number: 22115**

Dear Ms. Maus:

NRG Texas Power LLC (NRG Texas) has received and reviewed the W. A. Parish Electric Generating Station (WA Parish) Working Draft Permit (WDP) sent via email on March 23, 2015 and provides the following comments for the subject facility.

**General**

**Item No. 1**

As requested in your email dated March 23, 2015, attached is the 40 CFR Part 63, Subpart UUUUU compliance date extension approval letter.

**Item No. 2**

As requested, attached are Tables 2a and 2b of TCEQ Form OP-UA11 for the Chapter 117 Alternative Case Specific Specification for CO under Unit ID No. CTSC. NRG Texas requests to change the SOP Index Nos. to R71200-4 and R71200-5 for the two scenarios. Please update the SOP Index Nos. in the Unit Summary Table and Applicable Requirements Summary Table.

Similarly, for Unit ID Nos. GRP-B5-6, 7, and 8, Tables 6a and 6b of TCEQ Form OP-UA6 are attached for Chapter 117 Alternative Case Specific Specifications for CO and NH<sub>3</sub>. These Alternative Case Specifications were incorporated with the MSS amendments to the associated permits, which were issued on the following dates:

- Permit Nos. 2348A, PSDTX901, and N033 - 4/30/2012
- Permit Nos. 2349A, PSDTX902, and N034 - 4/30/2012
- Permit Nos. 5530, PSDTX33M1, and N035 - 4/30/2012
- Permit Nos. 7704 and PSDTX234M2 - 4/30/2012

NRG Texas requests that these Alternative Case Specific Specifications for GRP-B5-6, 7, and 8 be incorporated into the Title V permit at this time.

Item No. 3

Currently, Unit ID No. 7&8CH8 (Emergency Storage Pile) is included in the Title V permit under 40 CFR Part 60, Subpart Y applicability. While coal storage systems are subject to the provisions of NSPS Y for WA Parish, per 40 CFR §60.250(b), open storage piles are exempt from the definition of "coal storage system," as defined in 40 CFR §60.251(h). Therefore, Unit 7&8CH8 is not subject to this subpart. As such, NRG Texas requests to remove this unit from the Title V permit at this time. Please find attached Tables 1 and 2 of Form OP-SUMR in support of this request.

**Applicable Requirements Summary Table**

Item No. 4

Under Unit ID No. 8 for SOP Index Nos. 60Da-1 through 60Da-7, the Monitoring and Testing Requirements for PM currently contain "\*\*\*See CAM Summary". NRG Texas requests that the following high level requirement language be included as well:

"The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 60, Subpart Da."

**CAM Summaries**

Item No. 5

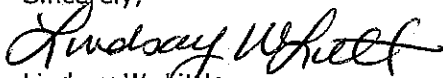
Under Unit ID No. 7 for SOP Index No. 60D-1, the Deviation Limit incorrectly references particulate matter. NRG Texas requests that this be changed to "Opacity shall not exceed 20% except for one six-minute period per hour of not more than 27% opacity."

Item No. 6

Under Group ID No. GRP-B5-6 for SOP Index Nos. 60D-1 to 60D-3, the Deviation Limits incorrectly reference particulate matter. NRG Texas requests that these be changed to "Opacity shall not exceed 20% except for one six-minute period per hour of not more than 27% opacity."

If you have any questions, do not hesitate to contact Lauren Wenner at (832) 357-5296 or by email at [lauren.wenner@nrg.com](mailto:lauren.wenner@nrg.com).

Sincerely,



Lindsay W. Little  
Environmental Manager

cc: Mr. Andy Goodridge, Air Section Manager, TCEQ Region 12, Houston, Texas (w/attachments)  
Mr. Jeff Robinson, Air Permits Section, USEPA Region 6, Dallas, Texas (w/attachments)

Bryan W. Shaw, Ph.D., *Chairman*  
Toby Baker, *Commissioner*  
Zak Covar, *Commissioner*  
Richard Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

November 24, 2014

MR CRAIG ECKBERG  
SENIOR MANAGER  
NRG TEXAS POWER LLC  
1201 FANNIN  
HOUSTON TX 77002

Re: Re: Title 40 Code of Federal Regulations Part 63, Subpart UUUUU Compliance Extension  
Title V Operating Permit Number: 074  
New Source Review Permit Number: 7704  
W.A. Parish Electric Generating Station Units 5, 6, 7, and 8  
Thompsons, Fort Bend County  
Regulated Entity Number: RN100888312  
Customer Reference Number: CN603207218  
Account Number: FG-0020-V

Dear Mr. Eckberg:

This is in response to your letter dated October 22, 2014, requesting an extension of one year to comply with the requirements in Title 40 Code of Federal Regulations (40 CFR) Part 63, Subpart UUUUU (National Emission Standards for Hazardous Air Pollutants from Coal- and Oil-Fired Electric Steam Generating Units). Based on the information in your letter dated October 22, 2014, the four coal-fired electric generating units at the W.A. Parish Electric Generating Station are hereby granted a one year extension from April 16, 2015 to April 16, 2016 to comply with the requirements in 40 CFR Part 63, Subpart A and UUUUU.

Item numbers 1 through 4 below are conditions of the compliance extension approval.

### **Emission Control Installations and Compliance Schedule**

1. The following compliance schedule shall be met, as represented in your request for compliance extension to satisfy the requirements of 40 CFR § 63.6(i)(6)(i):
  - (a) During the 2014 through 2015 time period, NRG Texas Power LLC (NRG) will complete construction of the activated carbon injection system on all four units. NRG will conduct additional feasibility studies to determine the appropriate control measures to comply with the MATS emission standards, including the startup and shutdown work practices. Additionally, NRG will evaluate the feasibility of an alternate fuel and the effects of this fuel on MATS compliance plan.
  - (b) During the 2015 through 2016 time period, NRG will startup and test control options and optimization for MATS compliance.
  - (c) Final compliance with the Subpart UUUUU standards for W.A. Parish Units 5, 6, 7, and 8 shall be achieved by April 16, 2016.

Mr. Eckberg  
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November 24, 2014

Re: Title V Operating Permit Number: 074

- (d) Initial compliance testing for W.A. Parish Units 5, 6, 7, and 8 required by 40 CFR § 63.10005 shall be conducted no later than 180 days following the one year extension date of April 16, 2016.

### **Support for Compliance Schedule**

2. NRG proposes an alternate compliance schedule based upon receiving a one year extension. The compliance schedule takes into consideration the engineering studies, operational testing, construction schedule to install additional pollution controls, and optimization of controls for W.A. Parish Units 5, 6, 7, and 8.

### **Notification and Other Requirements**

3. Once compliance with the standards is achieved for W.A. Parish Units 5, 6, 7, and 8, which shall be no later than April 16, 2016, NRG shall submit a notification to the TCEQ and the U.S. Environmental Protection Agency (EPA) Region 6, postmarked within 30 days of the date compliance was achieved, specifying the new compliance date and detailing the affected site and equipment. All monitoring, performance testing, recordkeeping, and reporting required by the applicable standards in Subpart A and UUUUU must begin on the new compliance date, or where time frames in the standards are established from the compliance date, must be based on the new compliance date.

The notification required in this condition should be directed to:

Air Section Manager  
TCEQ Region 12  
5425 Polk Street, Suite H  
Houston, Texas 77023 - 1452

With Copies To:

Texas Commission on Environmental Quality  
Air Permits Division, MC-163  
Mr. Erik Hendrickson  
P.O. Box 13087  
Austin, Texas 78711-3087

U.S. Environmental Protection Agency  
Region 6  
Attn: Air Permits Section (6PD-R)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

4. This compliance extension may be terminated, or additional requirements imposed, at any time the TCEQ or EPA determines that NRG is not making reasonable efforts to comply consistent with the compliance extension application.

Mr. Eckberg  
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Re: Title V Operating Permit Number: 074

Pursuant to 40 CFR § 63.6(i)(4)(i)(A), NRG is required to apply for a revision of the affected source's Title V permit (Permit Number 074) to incorporate the conditions of this compliance extension.

The TCEQ appreciates your attention to the changing applicable rule requirements. If you need further information or have any questions, please contact Mr. Erik Hendrickson, P.E. at (512) 239-1095 or write to the TCEQ, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Michael Wilson, P.E., Director  
Air Permits Division  
Office of Air  
Texas Commission on Environmental Quality

MPW/EH/eh

Enclosure

cc: Air Section Manager, Region 12 – Houston  
Air Permits Section Chief, New Source Review, Section (6PD-R), U.S. Environmental  
Protection Agency, Region 6, Dallas

Project Number: 219866



**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 1**

<b>Date:</b> April 2015	<b>Regulated Entity No.:</b> RN100888312	<b>Permit No.:</b> O-00074
<b>Company Name:</b> NRG Texas Power LLC		<b>Area Name:</b> W.A. Parish Electric Generating Station

Unit/Process						Preconstruction Authorizations	
AI	Revision No.	ID No.	Applicable Form	Name/ Description	CAM	30 TAC Chapter 116/ 30 TAC Chapter 106	Title I
D	1	7&8CH8	OP-SUMR	Emergency Storage Pile		7706A	



**Texas Commission on Environmental Quality  
Federal Operating Permit Program  
Individual Unit Summary for Revisions  
Form OP-SUMR  
Table 2**

<b>Date:</b> April 2015	<b>Regulated Entity No.:</b> RN100888312	<b>Permit No.:</b> O-00074
<b>Company Name:</b> NRG Texas Power LLC		<b>Area Name:</b> W.A. Parish Electric Generating Station

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.	Plant AI	Plant ID No.
1	7&8CH8	OP-SUMR	D	GRP-7&8CL		

**Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 16)  
Federal Operating Permit Program**

**Table 6a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)  
Subpart C: Combustion Control at Major Utility Electric Generation  
Sources in Ozone Nonattainment Areas**

<b>Date:</b> April 2015	<b>Permit No.:</b> O-00074	<b>Regulated Entity No.:</b> RN100888312
<b>Area Name:</b> W. A. Parish Electric Generating Station		<b>Customer Reference No.:</b> CN603207218

Unit ID No.	SOP Index No.	Date Placed In Service	Functionally Identical Replacement	Annual Heat Input	Service Type	Fuel Type	Fuel Type	Fuel Type	RACT NOx Emission Limitation	ESAD NOx Emission Limitation	EGF
GRP-B5-6	R71200-3	92-	N/A [1]	22+	UTIL	CL			N/A [2]	1210	YES
7	R71200-3	92-	N/A [1]	22+	UTIL	CL			N/A [2]	1210	YES
8	R71200-3	92-	N/A [1]	22+	UTIL	CL			N/A [2]	1210	YES

**Notes:**

- [1] Information only required if "Date Placed in Service" is "92-93," "93-FCD," or "FCD+" and located in Beaumont/Port Arthur Ozone Nonattainment Area per TCEQ's OP-UA11 instructions.  
[2] Information only required if located in Beaumont/Port Arthur ozone nonattainment area and "Service Type" is "AUX" or "AUX-D" per TCEQ's OP-UA11 instructions.



**Texas Commission on Environmental Quality  
Boiler/Steam Generator/Steam Generating Unit Attributes  
Form OP-UA6 (Page 17)  
Federal Operating Permit Program**

**Table 6b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)  
Subpart C: Combustion Control at Major Utility Electric Generation  
Sources in Ozone Nonattainment Areas**

<b>Date:</b> April 2015	<b>Permit No.:</b> O-00074	<b>Regulated Entity No.:</b> RN100888312
<b>Area Name:</b> W. A. Parish Electric Generating Station		<b>Customer Reference No.:</b> CN603207218

Unit ID No.	SOP Index No.	Fuel Firing Option	ESAD NO <sub>x</sub> DFW 8-Hour	NO <sub>x</sub> Monitoring System	Title 30 TAC Chapter 116 Permit Limit	CO Emission Limitation	CO Monitoring System	Ammonia Use	NH <sub>3</sub> Emission Limitation	NH <sub>3</sub> Monitoring System
GRP-B5-6	R71200-3	N/A [3]	N/A [4]	CEMS	N/A [5]	ACSS	CEMS	YES	ACSS	NONE
7	R71200-3	N/A [3]	N/A [4]	CEMS	N/A [5]	ACSS	CEMS	YES	ACSS	NONE
8	R71200-3	N/A [3]	N/A [4]	CEMS	N/A [5]	ACSS	CEMS	YES	ACSS	NONE

**Notes:**

- [3] Information only required if located in the Houston/Galveston/Brazoria ozone nonattainment area and "ESAD NO<sub>x</sub> Emission Limitation" is "X10" and "Service Type" is "UTIL" per TCEQ's OP-UA11 instructions.
- [4] Information only required if located in the Dallas/Fort Worth Eight Hour ozone nonattainment area and "ESAD NO<sub>x</sub> Emission Limitation" is "X10" and "Service Type" is "UTIL" per TCEQ's OP-UA11 instructions.
- [5] Information only required if located in the Beaumont/Port Arthur ozone nonattainment area, "RACT NO<sub>x</sub> Emission Limitation" is "X05" and the unit is an auxiliary steam boiler per TCEQ's OP-UA11 instructions.

**Texas Commission on Environmental Quality  
Stationary Turbine Attributes  
Form OP-UA11 (Page 4)  
Federal Operating Permit Program**

**Table 2a: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)  
Subchapter C: Combustion Control at Major Utility Electric Generation in Ozone Nonattainment Areas**

<b>Date:</b> April 2015	<b>Permit No.:</b> O-00074	<b>Regulated Entity No.:</b> RN100888312
<b>Area Name:</b> W. A. Parish Electric Generating Station		<b>Customer Reference No.:</b> CN603207218

Unit ID No.	SOP Index No.	Date Placed in Service	Functionally Identical Replacement	MW Rating	Service Type	Fuel Type	RACT NO <sub>x</sub> Emission Limitation	ESAD NO <sub>x</sub> Emission Limitation	Steam or Water Injection	EGF
CTSC	R71200-5	FCD+	N/A [1]	N/A [2]	PK72	NATGAS	N/A [3]	1210	N/A [2]	YES

**Notes:**

[1] Information only required if "Date Placed in Service" is "93-FCD," or "FCD+" and located in Beaumont/Port Arthur Ozone Nonattainment Area per TCEQ's OP-UA11 instructions.

[2] Information only required if located in Beaumont/Port Arthur or Dallas/Fort Worth Eight-Hour Ozone Nonattainment Areas per TCEQ's OP-UA11 instructions.

[3] Information only required if located in Beaumont/Port Arthur Eight-Hour Ozone Nonattainment Areas per TCEQ's OP-UA11 instructions.

**TCEQ-10023 (APDG 5750v16, Revised 09/13) OP-UA11**

**This form is for use by facilities subject to air quality permit requirements and may be revised periodically. (Title V Release 02/12)**

**Texas Commission on Environmental Quality  
Stationary Turbine Attributes  
Form OP-UA11 (Page 5)  
Federal Operating Permit Program**

**Table 2b: Title 30 Texas Administrative Code Chapter 117 (30 TAC Chapter 117)  
Subchapter C: Combustion Control at Major Utility Electric Generation in Ozone Nonattainment Areas**

<b>Date:</b> April 2015	<b>Permit No.:</b> O-00074	<b>Regulated Entity No.:</b> RN100888312
<b>Area Name:</b> W. A. Parish Electric Generating Station		<b>Customer Reference No.:</b> CN603207218

Unit ID No.	SOP Index No.	30 TAC Chapter 116 Permit Limit	NO <sub>x</sub> Monitoring System	Annual Electric Output	CO Emission Limitation	CO Monitoring System	Ammonia Use	NH3 Emission Limitation	NH3 Monitoring System
CTSC	R71200-5	N/A [4]	CEMS	2500-	ACSS	CEMS	NO	N/A [5]	N/A [5]

**Notes:**

[4] Information only required if "RACT NO<sub>x</sub>" is "X05" per TCEQ's OP-UA11 instructions.

[5] Information only required if "Ammonia Use" is "YES" per TCEQ's OP-UA11 instructions.